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BENTON HARBOR, MICHIGAN 49022

October 30, 2001

Mr. Thomas F. Maxwell, III Report Analyst Reports Analysis Division Federal Election Commission 999 E Street, NW Washington, D.C. 20463

Dear Mr. Maxwell,

We are in receipt of your letter dated October 17, 2001 (LD. No. C00039040). We received it on October 22, 2001.

You identified two contributions to Senator Spencer Abraham's 2000 reelection campaign that collectively exceeded the maximum allowable contribution limits for a general election by \$1,000.

This was an unintentional mistake by our Whirlpool Corporation Political Action Committee and it will not occur again.

Prior to your discovery of our mistake, we ordered GNOSOSS software (and training for that software) that will catch such future mistakes before our PAC issues any future campaign contribution checks. In other words, the corrective action against future similar errors was being implemented prior to receipt of your letter. The software has been installed and we will complete our software training within the next 30 days.

The Whirlpool Corporation PAC has been in existence since the mid-1970s. You will also see from your records that we are a relatively small PAC. Whirlpool Corporation PAC filed our first electronic report July 26, 2001 (2001 Mid-Year Report) in anticipation of reaching the \$50,000 threshold. We also have limited staff for administering FEC requirements. We have always been extremely sensitive to the Commission's compliance requirements. Given the fact that there were four years between the \$1,000 contribution and the \$5,000 contribution we simply forgot about the earlier contribution when making the later contribution.

We have asked for the \$1,000 from Secretary Abraham back to our Whirlpool Corporation PAC and will promptly provide you with Secretary Abraham's responding actions/correspondence. We accept responsibility for our mistake.

Respectfully,

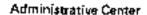
Michael C. Thompson

Director, Government Relations

michael C. Thompson

Attachment: Abraham Letter

ec: Deborah K. Jones





BENTON HARBOR, MICHIGAN 48022

October 30, 2001

The Honorable Spencer Abraham Secretary of Energy U.S. Department of Energy Forrestal Building 1000 Independence Avenue, SW Washington, D.C. 20585

Dear Mr. Secretary,

We are in receipt of a letter from the Federal Election Commission (attached) dated October 17, 2001 that identified an inadvertly excessive contribution by the Whirlpool Corporation Political Action Committee to your year 2000 election cycle.

On April 29, 1996 we contributed \$1,000 to your general election run for the U.S. Senate.

On October 27, 2000, realizing the closeness of your race we contributed \$5,000 to your year 2000 general election race.

We mistakenly overlooked the \$1,000 contributed four years earlier, and by so doing exceeded the maximum allowable contribution to a general election cycle by the \$1,000 amount.

The Commission is directing that we request a refund from you back to our Whirlpool Corporation Political Action Committee "of the amount in excess of \$5,000" (i.e., \$1,000). My mailing address is:

Michael C. Thompson Whirlpool Corporation Political Action Committee 2000 M 63 (3005) Benton Harbor, M1 49022

We apologize to you for this mistake. We thank you for your distinguished tenure in the U.S. Senate.

Respectfully,

Michael C. Thompson

Director, Government Relations

michael c. Thompson

Attachments:

- FEC Letter

Whirlpool Corporation PAC Reports

ce: Kathy Govan

Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

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Ø	Hand Delivered	Date of Receipt
	First Class Mail	POSTMARKED
	Registered/Certified Mail	POSTMARKED (R/C)
	No Postmark	
	Postmark Illegible	
	Received from the House office of Records and Registration	Date of Receipt
	Received from the Senate Office of Public Records	Date of Receipt
	Other (Specify):	Postmarked
		and/or Date of Receipt
	Electronic Filing	<u>.</u> .
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(6/2000)